

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

MARK SCHNEIDER, on behalf of
himself and all others similarly situated,

Plaintiff,

V.

Civil No. 1:18-cv-00402-TSE-IDD

METROPOLITAN WASHINGTON
AIRPORTS AUTHORITY,

Defendant.

**JOINT MOTION FOR BRIEFING SCHEDULE IN CONNECTION
WITH DEFENDANT’S ANTICIPATED MOTION TO DISMISS**

Plaintiff Mark Schneider and defendant Metropolitan Washington Airports Authority (“the Authority”), through their respective undersigned counsel, hereby submit this joint motion for briefing schedule in connection with the Authority’s anticipated motion to dismiss this putative class action.

1. Plaintiff's Complaint was filed on April 10, 2018. Plaintiff requested that the Authority waive service of process, and the Authority has agreed to do so. The Authority's deadline to answer, move, or other respond to the Complaint is currently June 11, 2018.

2. On May 9, 2018, the parties telephonically met and conferred regarding a briefing schedule with a motion to dismiss that the Authority anticipates filing pursuant to Fed. R. Civ. P. 12(b). During that meeting, counsel for the parties identified and discussed their upcoming personal and professional obligations, including plaintiff's counsel's family vacation between June 16 through 23. The parties agreed that, in light of these obligations a tailored briefing schedule would benefit both sides. The parties further agreed that, in the interest of judicial

economy and conservation of the parties' resources, no discovery should occur until after the Court has decided the Authority's anticipated Rule 12(b) motion to dismiss.

3. The parties therefore agreed to, and hereby jointly propose, the following schedule for briefing and argument of the Authority's Rule 12(b) motion to dismiss:

- a. The Authority shall file and serve its motion to dismiss on or before Monday, June 25, 2018.
- b. Plaintiff shall file and serve his response to the motion to dismiss on before Friday, July 20, 2018.
- c. The Authority shall file its reply in support of its motion to dismiss on or before Friday, August 3, 2018.
- d. The Authority's motion to dismiss shall be set for hearing on Friday, August 10, 2018, unless the Court chooses a different date.

4. For the Court's convenience, a proposed form of order is attached.

5. The parties waive hearing on this motion.

Dated: May 9, 2018

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

By: /s/ With Permission

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Respectfully submitted,

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